## IN THE UNITED STATE DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

KAITLYN BARLOW, Plaintiff,

v. Civil Action No.: 1:17-cv-100-LF-KK

GEICO ADVANTAGE INSURANCE COMPANY,
Defendant.

## MOTION TO REMAND TO STATE COURT

PLAINTIFF, Kaitlyn Barlow, through undersigned counsel of record, the action having been improperly removed by Defendant Geico Advantage Security Company ("Geico"), hereby moves this Court to remand this action to state court. Plaintiff concurrently files her memorandum brief in support of this motion setting forth the grounds and authority for the requested relief.

Respectfully submitted,

By: /s/ David B. Martinez

David B. Martinez

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January \_\_\_\_\_, 2017, I filed the foregoing pleading electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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